

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

STATE OF NEW MEXICO, EX REL., RAÚL  
TORREZ, ATTORNEY GENERAL,

Plaintiff,

- v. -

META PLATFORMS, INC.; INSTAGRAM, LLC;  
META PAYMENTS, INC.; META PLATFORMS  
TECHNOLOGIES, LLC; and MARK  
ZUCKERBERG,

Defendants.

No. 1:23-cv-01115-DLM-KK

**DECLARATION OF ROSS CREIGHTON IN SUPPORT OF DEFENDANTS'  
OPPOSITION TO MOTION FOR ORDER REQUIRING DEFENDANTS TO PRESERVE  
RELEVANT DOCUMENTS CONCERNING META ACCOUNTS REFERENCED IN  
THE COMPLAINT**

I, Ross Creighton, declare and state as follows:

1. I am a Manager of eDiscovery Case Management for Meta. I submit this Declaration in support of Defendants' Opposition to Plaintiff's Motion for Order Requiring Defendants to Preserve Relevant Documents Concerning Meta's Accounts Referenced in the Complaint ("Opposition"). The declaration is based on my personal knowledge and experience at Meta.

2. Each of the user accounts identified by Meta as relevant to the State's Complaint, and subsequently disabled, was submitted to have a legal hold applied to it. I received confirmation that each of the legal holds were applied. Meta uses this process, when appropriate, to prevent deletion of accounts that Meta has disabled.

3. Each of the user accounts identified by Meta as relevant to the State's Complaint, and subsequently disabled, was also submitted to have an account preservation capture performed. I received confirmation that each of the account preservation captures were successfully processed or submitted for processing.<sup>1</sup>

4. Meta has also preserved, using its Download Your Information tool, a copy of each of the accounts identified in the State's Complaint as having been used by a State investigator. I received confirmation that each of the Download Your Information copies were successfully generated, where available.

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<sup>1</sup> A small number of account preservation captures (not including accounts created by the State's investigators) are still processing as of today.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 4, 2024 at London, United Kingdom.

  
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Ross Creighton